

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA §
§
v. § **NO. 4:19-CR-00160 (3)**
§
RAFAEL RAMIREZ, Defendant §

MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes RAFAEL RAMIREZ, Defendant in the above-entitled and numbered cause by and through his undersigned attorney and respectfully files this Motion for Continuance and would show the Court as follows:

1. The Plea Agreement Deadline in this matter is July 13, 2020 with the Pre-Trial Conference and associated events scheduled for August 3, 2020.
2. Counsel for Defendant respectfully requests that all events be deferred to later dates to allow for adequate time to further interview potential witnesses and to allow time to discuss case with the prosecutor.
3. Legal Assistant to counsel for the Defendant has conferred with Ms. Anissa Kaufman, Paralegal for Assistant U.S. Attorney, Ernest Gonzalez, Esq. Ms. Kaufman indicates that the request for continuance is unopposed.
4. This motion is not made for purposes of delay but that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that his Motion for Continuance be granted.

Respectfully submitted,

THE LAW FIRM OF DERIC KING
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By: */s/ Deric King Walpole*
Deric King Walpole
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Attorney for RAFAEL RAMIREZ

CERTIFICATE OF SERVICE

This is to certify that on July 9, 2020, a true and correct copy of this motion was transmitted to Ernest Gonzalez at ernest.gonzalez@usdoj.gov.

/s/ Deric King Walpole
Deric King Walpole

CERTIFICATE OF CONFERENCE

This is to certify that on July 9, 2020, Teri Newsome, (Legal Assistant to Deric King Walpole, counsel for the Defendant) conferred with Ms. Anissa Kaufman, Paralegal for Assistant U.S. Attorney, Ernest Gonzalez, Esq. Ms. Kaufman indicated that the request for continuance is unopposed.

/s/ Deric King Walpole
Deric King Walpole

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ORDER ON MOTION FOR CONTINUANCE

On this the _____ day of _____, 2020, the Court considered Defendant's Motion for Continuance. The Court finds that the Motion has merit and should be granted. **IT IS THEREFORE ORDERED** that Defendant **RAFAEL RAMIREZ'S Plea Agreement Deadline, Pretrial Conference, Jury Selection, and Jury Trial be reset to a future date agreed to by the parties and for other such relief that this Honorable Court deems just and right.**

UNITED STATES DISTRICT JUDGE